

## The Honorable Benjamin Settle

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA**

Jo Anna Lang, PR of the estate of Dick Lang, Wife and Husband, adoptive parents of C.L., a minor child and R.L., a minor child, Jo Anna Lang, guardian ad litem, for C.L. and R.L.,

Plaintiffs,

V.

STATE OF WASHINGTON,  
DEPARTMENT OF SOCIAL AND  
HEALTH SERVICES, (DSHS) CHILD  
PROTECTIVE SERVICES, (CPS),  
Kaylena Gonzalez, individually and  
MARK AUSTIN GONZALEZ and as a  
marital community, Pamela Williams,  
individually, and Alan Robert Evans  
individually and as a marital community,  
Jennifer White and John DOE White  
individually and as a marital community,  
Laura Caruso, John Doe Caruso,  
individually and as a marital community;  
Sarah Coshow, and John DOE Coashow,  
individually and as a marital community,  
Janelle E. Redmond and JOHN DOE  
Redmond, individually and as a marital  
community, Larraine Martinez, and  
JOHN DOE Martinez, individually and  
as a marital community, Beth A.  
Kutzera, and JOHN DOE Kutzera,  
individually and GLENN T. KUTZERA

NO. 3:20-cv-05057-BHS  
NOTICE OF APPEARANCE  
**(CLERK'S ACTION REQUESTED)**

1 as a marital community, J. Aaron  
2 Merino, and JOHN DOE Merino; Jaimee  
3 Scheffler, individually and JOHN DOE  
4 Scheffler as a marital community, and,  
5 Office of the Attorney General, State  
6 Agency, Danial Hsieh, AAG, and  
7 Vancouver Police Department, and  
8 Cowlitz County Sheriff's Department,  
9 and Eimiko Murlin and Jeff Ian Murlin,  
10 individually and as a marital community  
11 were foster parents of C.L., and Steve  
12 Vallembois, Jimmy Howard, Foster  
13 parents for R.L., individually, and  
14 Kimberly Copeland, MD, Legacy  
15 Salmon Creek Medical Center,

16 Defendants.

17 TO: JO ANNA LANG, PR OF THE ESTATE OF DICK LANG, WIFE AND HUSBAND,  
18 ADOPTIVE PARENTS OF C.L., A MINOR CHILD AND R.L., A MINOR CHILD, JO  
19 ANNA LANG, GUARDIAN AD LITEM, FOR C.L. AND R.L., Plaintiff

20 TO: KEVIN JOHNSON, Plaintiff's Attorney

21 TO: CLERK OF THE COURT

22 YOU AND EACH OF YOU will please take notice that STATE OF WASHINGTON,  
23 DEPARTMENT OF SOCIAL AND HEALTH SERVICES, CHILD PROTECTIVE  
24 SERVICES, KAYLENA GONZALEZ, MARK AUSTIN GONZALEZ, PAMELA  
25 WILLIAMS, JENNIFER WHITE, LAURA CARUSO, SARAH COSHOW, JAY REDMOND  
1 (INCORRECTLY IDENTIFIED AS JANELLE E. REDMOND), LORRAINE MARTINEZ  
2 (INCORRECTLY IDENTIFIED AS LARRAINE MARTINEZ), BETH A. KUTZERA, J.  
3 AARON MERINO, JAIMEE SCHEFFLER, DANIEL HSIEH (INCORRECTLY IDENTIFIED  
4 AS DANIAL HSIEH), EIMIKO MURLIN, JEFF IAN MURLIN, STEVEN VALLEMBOIS  
5 (INCORRECTLY IDENTIFIED AS STEVE VALLEMBOIS), JAMES VALLEMBOIS  
6 (INCORRECTLY IDENTIFIED AS JIMMY HOWARD), by and through their attorneys, Robert  
7 W. Ferguson, Attorney General, and ANDREW BIGGS Assistant Attorney General, without  
8 waiving objections as to improper service, jurisdiction or venue, hereby enter their appearance in

1 the above-entitled action and requests that notice of any and all further proceedings in said action  
2 be served upon the undersigned attorney at the address stated below.

3 **TRANSMISSION BY FAX OR BY ELECTRONIC MAIL DOES NOT**  
4 **CONSTITUTE SERVICE, UNLESS AGREED IN WRITING OR UNLESS**  
5 **OTHERWISE REQUIRED BY COURT RULE.**

6 DATED this 3<sup>rd</sup> day of December, 2020.

7 ROBERT W. FERGUSON  
8 Attorney General

9 *s/ Andrew Biggs*  
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16 Attorneys for State of Washington, Department of  
17 Social and Health Services, CPS, Kaylena Gonzalez,  
18 Mark Austin Gonzalez, Pamela Williams, Jennifer  
19 White, Laura Caruso, Sarah Coshow, Jay Redmond,  
20 Lorraine Martinez, Beth A. Kutzera, J. Aaron  
21 Merino, Jaimee Scheffler, Danial Hsieh, Eimiko  
22 Murlin and Jeff Ian Murlin, Foster parents of C.L.,  
23 Steve Vallembois, and James Villambois Foster  
24 parents for R.L.

1 CERTIFICATE OF SERVICE

2 I certify that I caused a copy of the foregoing to be served on the following persons in  
3 the manner indicated on this 3<sup>rd</sup> day of December, 2020:

4  CM/ECF SYSTEM:

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